

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE-OPELOUSAS DIVISION

HARATIO A. SLEDGE

CIVIL ACTION

VERSUS

NUMBER_____

CHEVRON U.S.A., INC. AND
ALLIANCE OFFSHORE, LLC

JUDGE_____

MAGISTRATE_____

COMPLAINT

NOW INTO COURT, through undersigned counsel, comes plaintiff, HARATIO A. SLEDGE, a person of the full age of majority domiciled in Lafayette Parish, Louisiana, who with respect represents:

I.

Petitioner's claims are brought pursuant to the Admiralty and General Maritime Laws of the United States and/or, alternatively, for relief pursuant to Rule 905(b) of the Longshore and Harbor Workers' Compensation Act ("LHWCA").

II.

Alternatively, jurisdiction is proper pursuant to the Outer Continental Shelf Lands Act., 43 USC § 1331.

II.

Venue is proper in this district because the defendants are subject to personal jurisdiction in the Western District of Louisiana.

III.

Made defendants herein are:

- A. CHEVRON U.S.A., INC., a foreign corporation authorized to do and doing business in the Western District of Louisiana; whose registered agent for service of process in the State of Louisiana is The Prentice-Hall Corporation System, Inc., 320 Somerulos St., Baton Rouge, Louisiana, 70802-6129.
- B. ALLIANCE OFFSHORE, LLC, a domestic limited liability corporation authorized to do and doing business in the Western District of Louisiana; whose registered agent for service of process is Eric L. Trosclair, 11095 Hwy. 308, Larose, LA 70373.

IV.

On or about July 25, 2015, petitioner, HARATIO A. SLEDGE, an equipment operator employed by Schlumberger, was a passenger aboard the M/V Chase, a crew boat owned and operated by defendant, ALLIANCE OFFSHORE, LLC.

V.

At approximately 6:50 a.m. on July 25, 2015, petitioner, HORATIO A. SLEDGE, was attempting to transport from the M/V Chase via a swing rope to Main Pass 144-B, a fixed production platform owned and operated by defendant, CHEVRON U.S.A., INC., located on the Outer Continental Shelf in the Gulf of Mexico off the coast of Louisiana.

VI.

While attempting to transfer from the vessel to the platform via swing rope, petition was suddenly, negligently and without warning caused to fall into the Gulf of Mexico as a result of the negligence of defendants, CHEVRON U.S.A., INC. and ALLIANCE OFFSHORE, LLC.

VII.

Petitioner, HARATIO A. SLEDGE, was not negligent in the accident.

VIII.

Said accident, resulting in injuries and damages to your petitioner, HARATIO A. SLEDGE, was a direct and proximate result of the negligence and/or fault of defendant, CHEVRON U.S.A., INC., its employees, agents and/or other persons for whom it is responsible, in the following non-exclusive particulars:

- A. Improper and/or inadequate swing rope configuration;
- B. Improper and/or inadequate landing deck configuration;
- C. Improper and/or inadequate job planning, directives and/or coordination;
- D. Improper, inadequate and/or defective platform equipment and/or appurtenances;
- E. Improper and/or inadequate maintenance;
- F. Improper and/or inadequate training;
- G. Improper and/or inadequate supervision;
- H. Creating and/or permitting the existence of unreasonably dangerous conditions upon its platform;
- I. Failure to remedy unreasonably dangerous conditions upon its platform for which it had actual and/or constructive knowledge;
- J. Violation of state and/or federal safety rules and regulations;
- K. Violation of company rules and regulations;
- L. Violation of industry safety standards;
- M. Any other acts of negligence and/or gross negligence which may be revealed at or before the trial of this matter.

IX.

Said accident, resulting in injuries and damages to your petitioner, HARATIO A. SLEDGE, was a direct and proximate result of the negligence and/or fault of defendant, ALLIANCE OFFSHORE, LLC, its employees, agents and/or other persons for whom it is responsible, in the following non-exclusive particulars:

- A. Improper and/or inadequate vessel operations;
- B. Inadequate, inattentive and/or improperly trained captain;
- C. Inadequate, inattentive and/or improperly trained crew;
- D. Improper navigation;
- E. Failure to keep a safe and appropriate watch;
- F. Improper training;
- G. Improper supervision;
- H. Creating and/or permitting the existence of unreasonably dangerous conditions upon its vessel;
- I. Failure to remedy unreasonably dangerous conditions upon its vessel for which it had actual and/or constructive knowledge;
- J. Failure to properly maintain its vessel and/or appurtenances;
- K. Violation of state and/or federal safety rules and regulations;
- L. Violation of company rules and regulations;
- M. Violation of industry safety standards;
- N. Any other acts of negligence which may be revealed at or before the trial of this matter.

X.

Petitioner, HARATIO A. SLEDGE, was caused to suffer injuries as a result of said accident. Accordingly, petitioner itemizes his damages as follows:

- A. Medical expenses; past, present and future; in an amount reasonable in the premises;
- B. Lost wages; past, present and future; in an amount reasonable in the premises;
- C. Impairment of earning capacity; past, present and future; in an amount reasonable in the premises;
- D. General damages, including pain, suffering, disability, mental anguish and loss of enjoyment of life; past, present, and future; in an amount reasonable in the premises.

WHEREFORE, all premises considered, plaintiff, HARATIO A. SLEDGE, prays that defendants, CHEVRON U.S.A., INC. and ALLIANCE OFFSHORE, LLC, be duly served with a copy of this Complaint, cited to appear and answer same and, that after legal delays and due proceedings had, there be a judgment in favor of plaintiff, HARATIO A. SLEDGE, and against defendants, CHEVRON U.S.A., INC. and ALLIANCE OFFSHORE, LLC, jointly, severally and insolido, in an amount reasonable in the premises, together with legal interest from date of the incident and for all costs of these proceedings.

FURTHER, for all other such general and equitable relief as this Honorable Court may deem proper.

Respectfully submitted,

ANDERSON DOZIER BLANDA & SALTZMAN

s/Nick Blanda
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PLEASE SERVE:

CHEVRON U.S.A., INC.
Through their registered agent:
The Prentice-Hall Corporation System, Inc.
320 Somerulos St.
Baton Rouge, Louisiana, 70802-6129

ALLIANCE OFFSHORE, LLC
Through their registered agent:
Eric L. Trosclair
11095 Hwy. 308
Larose, LA 70373